

October 2, 2023

**VIA ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

**Re: *Relevant Sports, LLC v. FIFA, et al.*, No. 19-cv-8359 (VEC)**

Dear Judge Caproni:

In accordance with the Court's July 20, 2023 Order, ECF No. 110, the parties submit this joint status letter regarding the above-referenced litigation.

**Settlement Efforts**

The parties have been having productive settlement discussions and are hopeful that a settlement can be achieved, although there remain important issues to resolve. The parties look forward to continuing their settlement discussions with an aim of reaching a resolution by the end of October.

**Discovery**

*Protective Order.* The parties are negotiating a Protective Order and expect to have an agreed-upon proposed order in advance of any document exchanges.

*Initial Disclosures.* On August 21, Relevant served its Initial Disclosures on Defendants. FIFA and USSF are gathering information for and preparing their own initial disclosures.

*Document Discovery.* Relevant has served its First Set of Requests for Production on FIFA. FIFA's responses to those Requests are now due on November 8. Relevant and FIFA have discussed a streamlined mechanism for proceeding with document discovery in accordance with international laws if a settlement is not reached. Relevant is waiting to see if a settlement will soon be reached with USSF before proceeding with document discovery against it. FIFA is preparing its own Requests for Production to Relevant, which it expects to serve in November unless a resolution can be reached.

**Motion to Dismiss**

There is currently an October 13 deadline for Defendants to either answer the Amended Complaint or move to dismiss the case against them. In the interest maximizing the chances of reaching a settlement this month, the parties have agreed to extend the deadline to November 10. Simultaneously herewith, the parties are submitting a joint letter requesting an extension of Defendants' deadline to answer or respond to the Amended Complaint until November 10. If the parties are unable to reach a resolution through their ongoing settlement discussions, FIFA intends to move to dismiss. *See* June 2, 2023 Joint Letter addressed to Judge Valerie E. Caproni, at \*4–5 (Dkt. No. 106).

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In accordance with the Court's Order, the parties will submit another joint status update on November 1.

Respectfully submitted,

s/ Jeffrey L. Kessler

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